

COMMUNITY RELATIONS RESPONSIVENESS SUMMARY  
WESTERN PROCESSING SUPERFUND SITE  
KENT, WASHINGTON  
REMEDIAL INVESTIGATION AND FEASIBILITY STUDY FOR  
SUBSURFACE CLEAN-UP

JAN 28 1986

2200 Sixth Avenue / Seattle, WA 98101  
(Summary of Comments)

INTRODUCTION

A community relations program has been in place for two years. DOE and EPA have taken an active role in this plan. The major elements have included: monthly interagency meetings with the Kent City Mayor and her staff; public presentations/meetings whenever the city or city council has requested it; press releases at all major events, such as the release of data or reports, or the start of particular on-site activities; wide distribution of press releases and fact sheets; and the availability of government staff by phone to respond to questions from the public. Public interest is sporadically high, though the City of Kent, certain neighboring property owners, and a few individuals have had a high level of continued interest.

In mid-March 1985, a letter, a fact sheet, a separate Executive Summary, and the two volume Feasibility Study was made available to the public. Over 500 letters, fact sheets, and Executive Summaries were sent out. (This includes the approximately 300 copies which were sent to the PRPs.) Over 100 copies of the entire Feasibility Study were sent out to individuals, PRPs, and agencies known to be interested in the site. A dozen copies were made available through the local public and EPA regional libraries. In addition, copies were available free from EPA for the asking. The 30 day comment period closed April 10, 1985. As of April 26, 1985, 19 comment letters had been received. Table 1 lists the letters which had been received. No letters were identifiable as being from any PRP or the PRP committee. Copies of all letters have been placed in the libraries.

A series of four public meetings/workshops were held at the Kent City Hall. By the second meeting, virtually all attendees were what could be called "extremely or financially interested parties." Presentations were made by the PRP's coordinating committee's consultants, a neighboring property owner's consultants, the owner/operator of Western Processing, the most active environmentalist, and the fisheries biologist of the local Indian tribe, as well as by CH2M Hill. The on-going lawsuit between the neighboring property owner and the PRPs limited, to some extent, the range of potential exchanges between those two parties. Special small briefings were held for the affected property owners, natural resource agencies, environmentalists, and the press.

The responsiveness summary documents for the public record the comments raised during the comment period on the feasibility study and how EPA and the WDOE considered and responded to these concerns.

CONCERNS RAISED DURING THE COMMENT PERIOD

The major issues that were raised were:

1. Adequacy of the data to define an adequate remedial action. Statements were made that there isn't enough data to answer all the questions or to

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decide on a remedial action. The major areas which were affected by this concern are groundwater (Is there deep groundwater contamination which has reached the regional flow system?); Mill Creek (How far downstream and how deep are the sediments contaminated?); and, to a much smaller extent, soil (There isn't enough information to determine the exact extent (vertical and horizontal) of contamination so that excavation or capping can be defined.) During the comment period, most interested parties agreed that at least some components of a remedial action, especially on-property excavation with off-site disposal, could and should begin while any missing data are collected.

2. Adequacy of the data to demonstrate that there is a public health or environmental problem. The owner of Western Processing provided a detailed critique of many of the governments' and PRPs' documents. In his opinion, the data either does not exist or is inadequate or is unscientific to support the governments contention that there are any hazards associated with the site. Some examples are that the forms of lead and chromium on the site are non-hazardous, and that where and when there may be data showing contamination, that contamination is the result of the governments' actions or from other pollution sources. Other commenters questioned the validity or realism of the endangerment assessment because adults don't eat soil and no one is drinking the shallow groundwater.

3. Future public participation. A major comment during the public comment period on the Feasibility Study was the interested community's desire to have access to monitoring data and other information on the status of the site before significant decisions are made. Any further information which is collected needs to be shared with the public and further public input requested before major decisions are made.

4. Property values and future land use. The neighboring property owners are greatly concerned about being able to profitably develop and sell their land. The City of Kent would prefer that future use of the Western Processing site for roads and industrial development not be foreclosed.

5. Protection of workers during maintenance activities on the surrounding utilities. The remedial action should include actions which will protect utility employees who must in the future maintain the subsurface utilities near the site.

6. Preferred subsurface alternatives. A major, though not always successful, goal of the public comment period and meetings was to encourage participants to come up with and to give to EPA constructive ideas as to how the site should be cleaned up, rather than to focus on the problems they perceived in the Feasibility Study. Alternatives which involved excavation and off-site disposal appeared to be favored, while almost no one gave serious consideration to Alternative 3, the on-property landfill. Improvement of the groundwater was also favored. However, only very general feedback was given to EPA on what levels of "clean" were considered important. It appears that clean was generally assumed to mean background (e.g. upstream) water quality in Mill Creek, and adequately low soil contamination to allow City and the Health Department approval of industrial developments. Capping and then developing the entire area was suggested by some others. Other ideas included: lowering the water table at the site by

planting poplar trees and jerusalem artichokes; incineration of the soil; and excavation and then lining the site to use it as a stormwater detention pond. Questions raised about the PRPs proposal (Example Alternative 4) include the location of and effect of the diversion wall, the number of years of groundwater extraction, and the need for off-site clean-up.

7. Preferred Mill Creek alternatives. A number of people suggested that rerouting Mill Creek could be a good solution to the Western Processing situation. In addition, a number of the property owners are extremely interested in having Mill Creek rerouted so that the existing creek bed could be filled and their property more easily and fully developed. The natural resource agencies, the Indian tribe, and others are most concerned that Mill Creek water quality and fish habitat are improved. Excavation of contaminated sediments harmful to aquatic organisms was generally supported.

#### RESPONSE TO COMMUNITY CONCERNS

1. Adequacy of the data to define an adequate remedial action. The proposed remedial action has been staged to ensure that there will be adequate data to make the necessary decisions about the details of the remedial action. Some examples include:

a. Extensive additional soil sampling, particularly off-site, will be performed as part of final design of the remedial action to determine where and to what depths there are soils that should be excavated.

b. The first set of long-term monitoring wells have been installed west of Area I. Samples from these sets of wells will help resolve questions regarding the regional groundwater flow and contamination. These and other wells will be extensively monitored to ensure the effectiveness of the remedial action.

c. Conditionally required actions will be implemented if regional groundwater contamination from Western Processing is detected. Decisions on the final level of groundwater clean-up will be postponed until the limits of the proposed remedial action are studied.

2. EPA's data has generally been collected and analyzed according to approved EPA procedures. EPA disagrees with the owner's interpretation of the data which forms the basis of his arguments. For example, the 1980 Storet data does show greatly increased contamination between the upstream and downstream data points. Zinc is a good example. The upstream sample is below the ambient water quality criteria for aquatic organisms while the downstream sample is approximately 15 times the criteria. On another point, the largest set of data on the on-site contamination (the "3013 report", dated May 1983) was based on samples taken in the fall of 1982 while Western Processing was still operating. All sample results will continue to be sent to the property owner and all other interested parties.

3. Future public participation. EPA intends to remain the lead agency for community relations, with active participation by WDOE and the contractors. It is EPA's intention that community relations activities will include:

- Public presentations on the progress of work on the Western



Processing site, with the frequency and location to be guided by public interest and the City of Kent. A possible approach is for monthly presentations at the City of Kent City Council Workshops throughout the design and active remedial construction period, with quarterly or annual presentations during the extended O&M and monitoring periods.

- Continuation of the information repository at the City of Kent and EPA Regional library. At a minimum, copies of all public and press releases; quality assured groundwater, surface water, soil, sediment, and air monitoring data; detailed planning studies and supplemental remedial planning documents and all other similar documents will be placed in these repositories promptly.

- Public presentations on the supplemental planning studies, if any are initiated. Public presentations would, at a minimum, be made during the design or scoping of the study, and again when the study is completed and recommendations are made. These public presentations may be part of the above regular public presentations, with additional public announcements on the agenda of the presentation.

- Preparation and distribution of a public notice and fact sheet at the completion of engineering design

4. Property values and future land use. The recommended remedial alternative will not foreclose development of property outside Area I in the future. The off-site soil clean-up criteria will allow safe development of the properties, though worker protection may be recommended by the health department during deep excavation for utilities. Cap/cover maintenance will be necessary until a site is developed and an alternative cover placed on the site by the property developer. For certain properties, development in the short-term may not be possible because groundwater extraction wells and other facilities vital for the clean-up may not be compatible with development.

Decisions of whether Area I can be developed will have to wait. If the soil on the site is eventually solidified or stabilized in place such that a RCRA cap is no longer necessary for the protection of public health and the environment, development of the site may be possible. If a RCRA cap was to be placed on the site today, future development of the site may not be possible. Depending on the final design, a RCRA equivalent cap may or may not be compatible with development.

5. Protection of workers during maintenance activities on the surrounding utilities. The recommended alternative includes inspection and cleaning of the nearby manholes and vaults which may be entered during regular maintenance activities. Soils along the Olympic pipeline which may pose a direct contact hazard will be removed or the pipeline moved.

6. Preferred subsurface alternatives. The selected remedy incorporates many features which were discussed or raised during the public comment period. Examples include additional soil and groundwater testing (as discussed above); reconsideration of alternative technologies to reduce the hazards of any materials left on-site, excavation and off-site disposal

of the most hazardous materials, a performance standard approach for groundwater cleanup, and off-property clean-up. A diversion wall is not part of the selected remedy.

7. Preferred Mill Creek alternatives. The possibility of moving the creek was reconsidered after the comment period closed. While moving the creek may have benefits for some property owners wishing to develop their properties, the Fund and the NCP is designed to mitigate environmental problems from releases of hazardous substances. Because Mill Creek is the groundwater "sink" for water under Western Processing, some of the suggestions for moving Mill Creek could make the extent of shallow groundwater contamination greater and thus would be detrimental. Moving the creek would be environmentally acceptable only if the existing creek bed would be replaced by a French drain, if the discharge from the French drain would be guaranteed to meet NPDES standards, and if the French drain was properly maintained. This would be more expensive than the selected remedy without environmental benefits. Also, a good sized easement for the re-routed creek would be necessary to ensure adequate flood flow capacity. The selected alternative is largely oriented towards ensuring improved water quality in Mill Creek. It also includes excavation of contaminated sediments which may be harmful to aquatic organisms.

September 1985

Table 1

WESTERN PROCESSING

PUBLIC COMMENT PERIOD ON THE FEASIBILITY STUDY

As of April 26, 1985, written comments had been received from the following:

Greg Wingard, TEAC and the Proposal Consensus Group

The Department of the Interior

Olympic Pipe Line Company

Metro

NOAA

Puget Power

Dean Bitney and Chuck Grouws

U.S. Army Corps of Engineers

The City of Kent

Myron Harr

Western Processing

Karen Olson Rasmussen, Franklin & Watkins

Pacific Northwest Bell

Puget Sound Alliance

Trout Unlimited

Washington Institute for Judicial Review \*

EPA-ORD, Hazardous Waste Engineering Research Laboratory, Cincinnati

Standard Equipment, Inc.

Department of Community Development

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